

UNITED STATES DISTRICT COURT  
DISTRICT OF NEBRASKA

FILED  
U. S. DISTRICT COURT  
DISTRICT OF NEBRASKA  
2025 MAY 19 AM 10:38

Sandra K. Baker,

Plaintiff,

v.

City of Lincoln, Nebraska, et al.,

Defendants.

**RECEIVED**

MAY 19 2025

CLERK  
U.S. DISTRICT COURT

Case No.: 4:25-cv-03107-JFB-PRSE

**\*\*MOTION FOR LEAVE TO FILE AMENDED COMPLAINT\*\***

Plaintiff Sandra K. Baker, proceeding pro se, respectfully requests leave to file an amended complaint to add the Lancaster County Sheriff's Department as a defendant and include newly discovered facts.

**\*\*Good Cause\*\***: The amendments are necessary to fully present claims of constitutional violations, including Second Amendment deprivations and additional police misconduct.

Respectfully submitted,

Date: 5/18/2025

Signature: Sandra Baker

Sandra K. Baker

5400 Salt Valley View Apt 1

Lincoln, NE 68512

## **AMENDED CIVIL RIGHTS COMPLAINT**

*(Including Lancaster Sheriff's Department and Additional Factual Allegations)*

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### **I. PARTIES (AMENDED)**

**Plaintiff:** Sandra K. Baker, Lincoln resident and:

- Domestic violence survivor (1992–2015)
- Victim of retaliatory policing (2003–2025)

**Defendants:**

- **Lincoln Police Department (LPD):** Responsible for discriminatory policies.
  - **Lancaster County Sheriff's Department (LCSD):** Responsible for unconstitutional denial of firearm permit.
  - **John/Jane Doe Officers:** 30+ officers from LPD and LCSD who violated Plaintiff's rights.
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### **II. FACTUAL ALLEGATIONS (AMENDED)**

#### **A. Denial of Firearm Permit Renewal (January 28, 2025)**

1. On January 28, 2025, LCSD denied Plaintiff's firearm permit renewal, falsely claiming a domestic violence conviction.
2. When Plaintiff demanded evidence, LCSD representatives first stated records were "purged," then inconsistently claimed the "conviction itself was purged."
3. No such conviction exists. This denial constitutes retaliatory deprivation of Plaintiff's Second Amendment rights and due process violations.

#### **B. Police Inaction and Retaliation (2023–2025)**

4. **Lyft Incident (Fall 2023/2024):**
  - A Lyft driver refused to take Plaintiff and her disabled brother to their apartment, threatened, "I know where I can take you," and drove erratically.
  - Police refused to arrest or cite the driver despite Plaintiff's kidnapping report.
5. **Illegal Car Repossession (Fall 2023/2024):**

- Repossession agents unlawfully entered Plaintiff's closed garage.
- LPD officers dismissed Plaintiff's complaint, refusing to investigate or cite the agents.

**6. April 4, 2025 Child Abuse Incident:**

- Plaintiff's daughter assaulted her and her granddaughter. Police arrested the daughter but released her after running Plaintiff's name, instead citing Plaintiff for "disturbing the peace."
- Officers ignored grandchildren's abuse allegations, falsely claiming Plaintiff "coached" the granddaughter.

**7. Failure to Respond to Suicide Risk (April 2025):**

- After a supervisor allegedly called 911 for Plaintiff's suicidal granddaughter, no officers or EMTs arrived. Police falsely claimed they were on scene.

**C. Medical Neglect and Hospital Abuse (2021–2024)**

**8. 2021 Hospital Incident:**

- Nurses sought to halt Plaintiff's brother's anti-rejection medication unlawfully. Police refused to intervene.

**9. 2024 Hospital Restraint Incident:**

- Hospital staff restrained Plaintiff's brother in a dangerous position. Police dismissed her complaint as "he-said-she-said."

**D. Historical Pattern of Discrimination (1992–2018)**

**10. Domestic Violence Failures:**

- Police ignored strangulation (no bruises) and allowed a husband to violate a protection order (2010s).

**11. Child Abuse Complaints Ignored:**

- Officers dismissed reports of teacher abuse (2018), head injury (grandson, 2010s), and eye injury (grandson, 2010s).

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**III. LEGAL CLAIMS (AMENDED)**

**COUNT 1: 42 U.S.C. § 1983 (Equal Protection + Due Process Violations)**



- **Theory:** Systemic discrimination against Plaintiff as a Black woman, including:
  - Retaliatory firearm permit denial (LCSD).
  - Failure to investigate crimes against Plaintiff.
  - Disparate enforcement of laws.

**COUNT 2:** First Amendment Retaliation

- **Pattern:** Punishing Plaintiff for reporting crimes (e.g., citations after complaints).

**COUNT 3:** Second Amendment Violation (LCSD)

- **Theory:** Unconstitutional denial of firearm permit without due process.

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**IV. RELIEF REQUESTED (AMENDED)**

1. **Declaratory Judgment:** LPD and LCSD policies unconstitutional.
2. **Injunctive Relief:**
  - Court-ordered reforms for LPD and LCSD.
  - Expungement of all wrongful charges (including firearm permit denial).
  - Reinstatement of Plaintiff's firearm permit.
3. **\$10,000,000 in damages.**

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**V. JURY DEMAND & FILING**

- **File with:** Clerk, U.S. District Court, 300 S 4th St, Lincoln, NE.
- **Serve:** Lincoln City Attorney (3633 O St) + Lancaster County Attorney.

**VERIFICATION**

"I declare under penalty of perjury that these facts are true."

Date: 5/18/2025  
Signature: *Shane Butler*  
5400 Salt Valley View Apt 1  
Lincoln, NE 68512

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